

### REMARKS

Claims 1-28 are pending in the application, with claims 1, 4, 8, 12, 15 and 19 being independent. Claim 1 has been amended to recite "an inorganic insulating film *in contact with* the second electrode" (emphasis added). Support for this amendment may be found, for example, in Figs. 1 and 4B of the application. No new matter has been introduced.

Independent claim 1, along with its dependent claims 2, 3 and 23, has been rejected as being anticipated by Haskal (U.S. Patent 5,952,778). Applicants request reconsideration and withdrawal of the rejection of claim 1, and its dependent claims, because Haskal does not describe or suggest an inorganic insulating film in contact with a second electrode, as recited in amended claim 1.

Haskal describes an encapsulated organic light emitting device that includes a three layer protective covering 10 that shields the device from ambient contaminants. The three layer protective covering 10 includes a second layer 14, which the rejection equates to the recited inorganic insulating film. The second layer 14, however, is not in contact with the cathode electrode 4, which the rejection equates to the recited second electrode. Rather, the second layer 14 is in contact with metal layer 12. For at least this reason, applicants request reconsideration and withdrawal of the rejection of claim 1 and its dependent claims 2, 3 and 23.

Independent claims 4, 8, 12, 15, and 19, along with their dependent claims 5-7, 9-11, 13, 14, 16-18, 20-22 and 24-28, have been rejected as being unpatentable over Yamazaki (U.S. Patent Application Publication 2001/0055841) in view of Haskal.

Independent claim 4 recites a light-emitting apparatus that includes a light-emitting device having a first electrode formed over a substrate, an electroluminescent film formed over the first electrode, and a second electrode formed over the electroluminescent film. The inorganic insulating film is formed over the second electrode, and an organic insulating film is formed over the inorganic insulating film. A film containing fluoroplastics is formed over the organic insulating film, and a sealing substrate is positioned over the film containing fluoroplastics. Applicants request reconsideration and withdrawal of the rejection of claim 4, and its dependent claims, because neither Yamazaki, Haskal, nor any proper combination of the two describes or suggests the recited light-emitting apparatus including a sealing substrate positioned over the film containing fluoroplastics.

Yamazaki describes a light emitting device that includes a cover material 1001, which the Examiner equates to the recited flouroplastic film. As stated by the Examiner on page 4 of the Final Office Action, Yamazaki does not describe or suggest a sealing substrate positioned over the film containing flouroplastics. The Examiner relies on Haskal to cure this deficiency of Yamazaki.

As described previously, Haskal describes an organic light emitting device that includes a three layer protective covering 10. The three layer protective covering 10 includes a third layer 16 having a hydrophobic polymer, which the Examiner apparently equates to the recited flouroplastic film. Haskal states "optionally, a layer of glass or metal can be formed over the polymer layer for impact resistance." The Examiner is apparently equating this optional glass or metal layer formed over the third layer 16 with the recited sealing substrate and asserts that a person of ordinary skill in the art would have been motivated to modify Yamazaki's light emitting device to incorporate this "sealing substrate" of Haskal over the cover material of 1001 of Yamazaki "in order to increase the impact resistance of the device." See page 5 of the Final Office Action.

Applicants, however, assert that a person of ordinary skill in the art would not have been motivated to modify Yamazaki in the manner suggested by the Examiner because (1) Yamazaki's cover material 1001 already seals Yamazaki's device, rendering an additional sealing substrate unnecessary; and (2) Yamazaki describes the cover material 1001 as being made of glass, thereby already providing the impact resistance described by Haskal (paragraph 0135 of Yamazaki). In particular, as shown in Fig. 8B, Yamazaki's light emitting device is already sealed by cover material 1001, which the examiner equates to the recited flouroplastic film and which is bonded to the EL elements of Yamazaki's device by first sealer 1002 and sealing medium 1007.

For at least these reasons, applicants request reconsideration and withdrawal of the rejection of claim 4 and its dependent claims 5-7 and 24.

Independent claim 8 recites a light-emitting apparatus that includes a light-emitting device having a first electrode formed over a substrate, an electroluminescent film formed over the first electrode, and a second electrode formed over the electroluminescent film. A first inorganic insulating film is formed over the second electrode, and an organic insulating film is formed over

the inorganic insulating film. A second inorganic insulating film is formed over the organic insulating film, and a film containing fluoroplastics is formed over the second inorganic insulating film. A sealing substrate is positioned over the film containing fluoroplastics. For at least the reasons described above, applicants request reconsideration and withdrawal of the rejection of claim 8, and its dependent claims 9-11 and 25, because neither Yamazaki, Haskal, nor any proper combination of the two describes or suggests the recited light-emitting apparatus including a sealing substrate positioned over the film containing fluoroplastics.

Independent claim 12 recites a light-emitting apparatus that includes a light-emitting device having a first electrode connecting electrically to a TFT formed over a substrate via an insulating film, an electroluminescent film formed over the first electrode, and a second electrode formed over the electroluminescent film. An inorganic insulating film is formed over the second electrode. A film containing fluoroplastics is formed over the inorganic insulating film, and a sealing substrate is positioned over the film containing fluoroplastics. For at least the reasons described above, applicants request reconsideration and withdrawal of the rejection of claim 12, and its dependent claims 13, 14 and 26, because neither Yamazaki, Haskal, nor any proper combination of the two describes or suggests the recited light-emitting apparatus including a sealing substrate positioned over the film containing fluoroplastics.

Independent claim 15 recites a light-emitting apparatus including a light-emitting device having a first electrode connecting electrically to a TFT formed over a substrate via an insulating film, an electroluminescent film formed over the first electrode, and a second electrode formed over the electroluminescent film. An inorganic insulating film is formed over the second electrode, and an organic insulating film is formed over the inorganic insulating film. A film containing fluoroplastics is formed over the organic insulating film, and a sealing substrate is positioned over the film containing fluoroplastics. For at least the reasons described above, applicants request reconsideration and withdrawal of the rejection of claim 15, and its dependent claims 16-18 and 27, because neither Yamazaki, Haskal, nor any proper combination of the two describes or suggests the recited light-emitting apparatus including a sealing substrate positioned over the film containing fluoroplastics.

Independent claim 19 recites a light-emitting apparatus including a light-emitting device having a first electrode connecting electrically to a TFT formed over a substrate via an insulating

film, an electroluminescent film formed over the first electrode, and a second electrode formed over the electroluminescent film. A first inorganic insulating film is formed over the second electrode, and an organic insulating film is formed over the first inorganic insulating film. A second inorganic insulating film is formed over the organic insulating film, and a film containing fluoroplastics is formed over the second inorganic insulating film. A sealing substrate is positioned over the film containing fluoroplastics. For at least the reasons described above, applicants request reconsideration and withdrawal of the rejection of claim 19, and its dependent claims 20-22 and 28, because neither Yamazaki, Haskal, nor any proper combination of the two describes or suggests the recited light-emitting apparatus including a sealing substrate positioned over the film containing fluoroplastics.

Applicants submit that all claims are in condition for allowance.

Applicants do not acquiesce in the Examiner's characterizations of the art. For brevity and to advance prosecution, however, applicants may have not addressed all characterizations of the art and reserve the right to do so in further prosecution of this or a subsequent application. The absence of an explicit response by the applicants to any of the Examiner's positions does not constitute a concession of the Examiner's positions. The fact that applicants' comments have focused on particular arguments does not constitute a concession that there are not other arguments for patentability of the claims. All of the dependent claims are patentable for at least the reasons given with respect to the claims on which they depend.

Enclosed are checks for the \$790 Request for Continued Examination fee and the \$120 Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

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Respectfully submitted,

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